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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

11 EPIC GAMES, INC.,

12 Plaintiffs and Counter-
13 Defendants,

14 v.

15 APPLE, INC.,

16 Defendant and Counter-
17 Plaintiff.

Case No. 4:20-cv-05640-YGR-TSH

**[PROPOSED] ORDER RE: APPLE
INC.'S ADMINISTRATIVE MOTION
TO SEAL**

The Honorable Yvonne Gonzalez Rogers
Courtroom 1, 4th Floor

Pursuant to Federal Rule of Civil Procedure 26(c) and Civil Local Rule 79-5, Apple Inc. (“Apple”) has filed an Administrative Motion to Seal (the “Motion”). In support, Apple filed the accompanying declaration of Mark A. Perry.

Having considered the Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

IT IS HEREBY ORDERED that Apple’s request, consistent with the designations in the Administrative Motion, is **GRANTED**.

Accordingly,

(1) The public shall only have access to the version of the partially sealed documents sought to be sealed by the Motion in which portions of these documents have been redacted for the reasons set forth below:

Portion of Document Sought to be Sealed	Document Title	Reason to Seal
Highlighted information on pages 5 and 10-11.	Apple Inc.’s Response to Order Regarding Discovery Sanctions [Dkt. 1171]	Attorney-client privilege and work-product doctrine
Highlighted information in paragraphs 37, 44, 52, 53, 54, 92, and 93.	Declaration of Mark A. Perry in Support of Apple Inc.’s Response to Order Regarding Discovery Sanctions [Dkt. 1171]	Attorney-client privilege and work-product doctrine
Entire document	Ex. A (Outside counsel’s privilege-specific review protocol provided to Deloitte)	Attorney-client privilege and work-product doctrine
Entire document	Ex. B (Outside counsel’s general review protocol provided to Deloitte)	Attorney-client privilege and work-product doctrine
Entire document	Ex. C (Outside counsel quality control review protocol)	Attorney-client privilege and work-product doctrine

Portion of Document Sought to be Sealed	Document Title	Reason to Seal
Entire document	Ex. D (Apple's company-wide privilege training)	Attorney-client privilege and work-product doctrine
Entire document	Ex. K (Outside counsel re-review protocol)	Attorney-client privilege and work-product doctrine

IT IS SO ORDERED.

Dated: _____, 2025

The Honorable Yvonne Gonzalez
Rogers
United States District Court Judge